

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LOYALTY CONVERSION SYSTEMS
CORPORATION

Plaintiff,

v.

Case No. 2:13-CV-655-JRG
(LEAD CASE)

AMERICAN AIRLINES, INC., ET AL.
Defendants.

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANTS’ MOTION FOR JUDGMENT**

Plaintiff Loyalty Conversion Systems Corporation (“Loyalty Conversion”) hereby respectfully moves for an extension of time to respond to Defendants Delta Air Lines, Inc. (“Delta”), US Airways, Inc. (“US Airways”), United Airlines, Inc. (“United”), American Airlines, Inc. (“American”), Southwest Airlines, Co. (“Southwest”), Spirit Airlines, Inc. (“Spirit”), and Frontier Airlines, Inc. (“Frontier”) (collectively “Defendants”) Motion for Judgment on the Pleadings and Memorandum in Support filed on April 4, 2014 [Doc. No. 61] (the “Motion”). In support thereof, Plaintiff would show the Court the following:

Loyalty Conversion’s response to the Motion is currently due on April 21, 2014. The present Motion requests an extension until and including April 28, 2014. Counsel for the parties have conferred with respect to this Motion, and counsel for Defendants have indicated Defendants are unopposed to the relief sought in this Motion. The extension is not sought for purposes of delay but so that justice may be done.

Dated: April 18, 2014

Respectfully submitted,

By: /s/ Andrew G. DiNovo

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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), the undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h), and that Defendants are unopposed to the foregoing motion.

/s/ Andrew G. DiNovo

Andrew G. DiNovo

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel, who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on this the 18th day of April 2014.

/s/ Andrew G. DiNovo

Andrew G. DiNovo